

IN THE UNITED STATES DISTRICT COURT  
THE NORTHERN DISTRICT OF CALIFORNIA

RESOLUTE FOREST PRODUCTS, INC.,  
RESOLUTE FP US, INC., RESOLUTE FP  
AUGUSTA, LLC, FIBREK GENERAL  
PARTNERSHIP, FIBREK U.S., INC., FIBREK  
INTERNATIONAL INC., and RESOLUTE FP  
CANADA, INC.,

Plaintiffs,

v.

GREENPEACE INTERNATIONAL (aka  
"GREENPEACE STICHTING COUNCIL").  
GREENPEACE, INC., GREENPEACE FUND,  
INC., FORESTETHICS, DANIEL BRINDIS,  
AMY MOAS, MATTHEW DAGGETT, ROLF  
SKAR, TODD PAGLIA, and JOHN AND JANE  
DOES 1 through 20, inclusive,

Defendants.

Case No. 17-cv-02824-JST

**DECLARATION OF THOMAS W.  
WETTERER IN SUPPORT OF  
GREENPEACE DEFENDANTS' MOTION  
TO RECOVER ATTORNEYS' FEES AND  
COSTS [C.C.P. § 425.16(C)]**

Date: April 4, 2019  
Time: 2:00 pm  
Place: Courtroom 9

Complaint Filed: May 31, 2016  
Amended Complaint Filed: November 8, 2017

**DECLARATION OF THOMAS W. WETTERER**

I, Thomas W. Wetterer, declare as follows:

1. I am the General Counsel of Greenpeace, Inc. ("GP Inc."), defendant in the above-captioned matter.

2. I have managed the in-house legal department of GP Inc. for more than 20 years. In that capacity, I routinely hire and oversee legal work performed by outside law firms.

3. The instant Declaration is submitted in support of the Greenpeace Defendants' Motion to Recover Attorneys' Fees and Costs [C.C.P. ¶ 425.16(c)] from Resolute Forest Products, Inc. ("Resolute FP"), Resolute FP US, Inc., Resolute FP Augusta, LLC ("Resolute Augusta"), Fibrek General Partnership, Fibrek U.S., Inc., Fibrek International Inc., and Resolute FP Canada, Inc.

DAVIS WRIGHT TREMAINE LLP

1           4.       The Greenpeace Defendants retained the services of Davis Wright Tremaine LLP  
2 ("DWT") to provide legal counsel in this above-referenced matter. I reviewed the bills for all  
3 time entries by DWT personnel regarding this matter, and all costs and expenses DWT billed GP  
4 Inc. for this matter. Based on my experience as General Counsel, I found the amount of time and  
5 rates charged by DWT to be reasonable.

6           5.       In my role as General Counsel of GP Inc. I contributed my legal skill to the  
7 litigation by collaborating on strategy, reviewing legal briefs, and participating in moot  
8 arguments.

9           6.       The Greenpeace Defendants retained the legal services of attorneys at Tucker  
10 Long, P.C. in Augusta, Georgia to provide local counsel while this litigation was pending before  
11 the Southern District of Georgia. In a conservative exercise of billing judgment, the Greenpeace  
12 Defendants do not seek to recover attorneys' fees they incurred with Tucker Long in the instant  
13 motion for fees.

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15           I declare under penalty of perjury that the foregoing is true and correct.

16           Executed this 20th day of February, 2019, in Washington, D.C.

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20 Thomas W. Wetterer  
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